



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA

Richard C Church 3399963

(Enter above the full name of the plaintiff
or plaintiffs in this action).

(Inmate Reg. # of each Plaintiff)

VERSUS

CIVIL ACTION NO. 5:18-cv-00838
(Number to be assigned by Court)

Shawn Spence, Gary Sims.
DR. Marc Swanson

(Enter above the full name of the defendant
or defendants in this action)

COMPLAINT

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes _____

No ☒ _____

- B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:

Plaintiffs:

Defendants:

2. Court (if federal court, name the district; if state court, name the county);

3. Docket Number:

4. Name of judge to whom case was assigned:

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

6. Approximate date of filing lawsuit:

7. Approximate date of disposition:

(In item C below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item D for the names, positions, and places of employment of any additional defendants.)

C. Defendant: Shawn Spence, Gary Sims
is employed as: Greenbrier Co. Home Confinement Officers

147 Main ST ←
Ronceverte WV 24970
at ~~267 Dawkins Drive Suite A~~
Phone # ~~304-647-1389 Lewisburg WV 24901~~

D. Additional defendants: _____

Dr. Mark Swanson (Blue Ridge Pain Management)
1101 1st St. SW Roanoke Va. 24016
Phone # 540-291-7203

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

#1 I took care of Mother, got placed on home confinement. I was only one caring for Mother as she's disabled. I stated to officers she needs care if I go to jail and to call a nursing care assistance in my absence cause she wasn't able to be without care. Officers ignored my pleas, did nothing. My Mother dies on Jan 21st, 2018 at home of intoxication of pain meds & sleeping pills. I was placed in SRT prior to her passing by 2 Home Confinement officers. They knew my position at home. Wrongful Death!!!

IV. Statement of Claim (continued):

#2 Dr. Swanson Prescribed high doses of Narcotics, Painrelievers ~~Oxycodone~~, Gabapentin, ambien's (benzo's) Together & for Very Long periods of Time. Results in Mother's Death in Greenbrier Co. at home of Intoxification of Prescribed Narcotics. Mother was 65 years old.

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments.
Cite no cases or statutes.

Seeking Maximum amount for Wrongful death and Mental Anquish against all Defendants,

V. Relief (continued)):

VII. Counsel

- A. If someone other than a lawyer is assisting you in preparing this case, state the person's name:

- B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action?

Yes ☒ No ☐

If so, state the name(s) and address(es) of each lawyer contacted:

wrote letter to Cline & Campbell, No Response
Currently Incarcerated.

If not, state your reasons:

INcarceration Makes
it Very hard To Contact appropriate
Attorney.

- C. Have you previously had a lawyer representing you in a civil action in this court?

Yes ☐ No ☒

If so, state the lawyer's name and address:

Signed this 24th day of October, 2019.

Raul C. Chumel

Signature of Plaintiff or Plaintiffs

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 24th day Oct. 2019
(Date)

Raul C. Chumel

Signature of Movant/Plaintiff

Seeking!

Signature of Attorney
(if any)